



Matthew J. Bizzaro
Associate
mbizzaro@lbclaw.com

Attorneys at Law

L'Abbate, Balkan, Colavita & Contini, L.L.P.
1001 Franklin Avenue, Garden City, New York 11530
T. 516.294.8844 F. 516.294.8202
www.lbclaw.com

Writer's Direct Dial
(516) 837-7441

December 3, 2014

VIA ECF

Honorable Leonard D. Wexler
Alfonse D'Amato Federal Building
United States District Court
100 Federal Plaza
Central Islip, New York 11722

RE: *Moskowitz, Craig v. Pullin Law Firm, P.C.*
Case No.: 14-CV-6010

Dear Honorable Sir:

We were recently retained to represent the defendant, Pullin Law Firm, P.C. (collectively, "Defendant") in the above-referenced Fair Debt Collection Practices Act matter.

Following the service of his complaint, but prior to the expiration of Defendant's time to respond to same expired, plaintiff, Craig Moskowitz ("Plaintiff") improperly filed a motion seeking an order certifying the proposed class referenced in the complaint. Initially, Defendant contends that the filing of this motion was entirely premature since Defendant had not even appeared in this lawsuit, and no discovery had been conducted. Regardless, Defendant writes this letter to respectfully request that any decision on the motion be held in abeyance, and that a briefing schedule for Plaintiff's motion be ordered at a pre-motion conference in this matter, on a date to be determined by this Court.

Thank you for your kind consideration of this letter. If Your Honor has any questions, please feel free to contact me.

Respectfully submitted,

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.

A handwritten signature in black ink, appearing to read "Matthew J. Bizzaro", written over a horizontal line.

Matthew J. Bizzaro

MJB:dm
cc: Matthew J. Fogelson, Esq. (via ECF)